

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

Jean-Marc Zimmerman  
Zimmerman & Levi, LLP  
226 St. Paul Street  
Westfield, New Jersey 07090  
Tel: (908) 654-8000  
Fax: (908) 654-7207  
[jmzimmerman@zlk.com](mailto:jmzimmerman@zlk.com)

Jeffrey I. Kaplan  
Kaplan, Gilman & Pergament LLP  
1480 U.S. Highway 9 North  
Suite 204  
Woodbridge, New Jersey 07095  
Tel: (732) 636-4500  
Fax: (732) 636-4550  
[jkaplan@kgplaw.com](mailto:jkaplan@kgplaw.com)

Attorneys for Plaintiff Marlowe Patent Holdings LLC

MARLOWE PATENT HOLDINGS LLC,

Plaintiff,

v.

DICE ELECTRONICS, LLC; AAMP OF  
FLORIDA D/B/A AAMP OF AMERICA, INC.;  
PRECISION INTERFACE ELECTRONICS,  
INC.; LTI ENTERPRISES, INC. D/B/A/ USA  
SPEC; and VAIS TECHNOLOGY,

Defendants.

**Case No. 2:10-cv-01199-PGS-ES**

**SECOND AMENDED COMPLAINT FOR  
PATENT INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

Marlowe Patent Holdings LLC (hereinafter referred to as "Plaintiff" or "MPH") demands a jury trial and complains against the defendant as follows:

**THE PARTIES**

1. Marlowe is a limited liability company organized and existing under the laws of the State of New Jersey, having a place of business at 33 Honeck Street, Englewood, New Jersey 07631.

2. Upon information and belief, DICE Electronics, LLC (hereinafter referred to as "DICE") is a limited liability company organized and existing under the laws of the State of Nevada, conducting business in this district.



1 “Audio Device Integration System”. On March 4, 2010, Marlowe assigned all rights in and to the  
 2 ‘786 patent to MPH. The ‘786 patent pertains to an audio device integration system that enables  
 3 after-market audio products such as a CD player, a CD changer, an MP3 player, a satellite receiver,  
 4 a digital audio broadcast receiver, and other auxiliary sources, to be connected to, operate with, and  
 5 be controlled from, an existing stereo system in an automobile. A copy of the ‘786 patent is attached  
 6 hereto as Exhibit 1.

### 7 **CLAIM FOR PATENT INFRINGEMENT**

#### 8 **COUNT ONE**

9  
 10 12. Plaintiff MPH repeats and incorporates herein the entirety of the allegations  
 11 contained in paragraphs 1 through 11 above.

12 13. Defendant DICE has and still is directly infringing the ‘786 patent by, among other  
 13 things, selling and offering for sale in this judicial district interfaces that enable auxiliary audio  
 14 devices to be integrated with an existing automobile stereo system in a manner defined by the  
 15 claims of the ‘786 patent without permission from MPH. For example, DICE is selling and offering  
 16 for sale in this judicial district its I-Honda-R4/5V Silverline/PRO iPod and auxiliary audio input  
 17 interface.

18  
 19 14. Defendant AAMP has and still is directly infringing the ‘786 patent by, among other  
 20 things, selling and offering for sale in this judicial district interfaces that enable auxiliary audio  
 21 devices to be integrated with an existing automobile stereo system in a manner defined by the  
 22 claims of the ‘786 patent without permission from MPH. For example, AAMP is selling and  
 23 offering for sale in this judicial district its uPAC-TOY1, PXAMG, and GW16AC1 iPod/iPhone and  
 24 auxiliary audio input interfaces.

25 15. Defendant PIE has and still is directly infringing the ‘786 patent by, among other  
 26 things, selling and offering for sale in this judicial district interfaces that enable auxiliary audio  
 27 devices to be integrated with an existing automobile stereo system in a manner defined by the  
 28

claims of the '786 patent without permission from MPH. For example, PIE is selling and offering for sale in this judicial district its FRD04-POD/s iPod interface.

16. Defendant USA SPEC has and still is directly infringing the '786 patent by, among other things, selling and offering for sale in this judicial district interfaces that enable auxiliary audio devices to be integrated with an existing automobile stereo system in a manner defined by the claims of the '786 patent without permission from MPH. For example, USA SPEC is selling and offering for sale in this judicial district its PA15-INFI iPod and auxiliary audio input interface.

17. Defendant VAIS has and still is directly infringing the '786 patent by, among other things, selling and offering for sale in this judicial district interfaces that enable auxiliary audio devices to be integrated with an existing automobile stereo system in a manner defined by the claims of the '786 patent without permission from MPH. For example, VAIS is selling and offering for sale in this judicial district its SoundLinQ2 (SL2V) iPod video and auxiliary audio input interface.

18. MPH alleges that each of the Defendants' accused interface devices infringe claim 57 of the '786 patent. MPH believes that discovery will reveal that Defendants are infringing additional claims of the '786 patent.

19. Plaintiff has been damaged by each of the Defendants' infringement of the '786 patent and will be irreparably harmed unless such infringing activities are enjoined by this Court.

### **PRAYER FOR RELIEF**

WHEREFORE, the Plaintiff MPH prays for judgment against each one of the Defendants on all the counts and for the following relief:

- A. Declaration that the '786 patent is valid and enforceable;
- B. Declaration that each of the Defendants has infringed the '786 patent;
- C. A preliminary and permanent injunction against each of the Defendants, each of their officers, agents, servants, employees, and attorneys, all parent and subsidiary corporations, their assigns and successors in interest, and those persons acting in active concert or participation with

1 them, including distributors and customers, enjoining them from continuing acts of infringement of  
2 the '786 patent;

3 D. An accounting for damages under 35 U.S.C. §284 from each of the Defendants for  
4 their respective infringement of the '786 patent, and the award of damages ascertained against each  
5 one of the Defendants in favor of Plaintiff MPH, together with interest as provided by law;

6 E. Award of the Plaintiff's costs and expenses; and

7 F. Such other and further relief as this Court may deem proper, just and equitable.

8 **DEMAND FOR JURY TRIAL**

9 Plaintiff MPH demands a trial by jury of all issues properly triable by jury in this action.

10 By: /s/Jean-Marc Zimmerman

11 Jean-Marc Zimmerman  
12 Zimmerman & Levi, LLP  
13 226 St. Paul Street  
14 Westfield, NJ 07090  
15 Tel: (908) 654-8000  
16 Fax: (908) 654-7207  
17 [jmzimmerman@zlk.com](mailto:jmzimmerman@zlk.com)

18 Jeffrey I. Kaplan  
19 Kaplan, Gilman & Pergament LLP  
20 1480 U.S. Highway 9 North  
21 Suite 204  
22 Woodbridge, New Jersey 07095  
23 Tel: (732) 636-4500  
24 Fax: (732) 636-4550  
25 [jkaplan@kgplaw.com](mailto:jkaplan@kgplaw.com)

26 Attorneys for Plaintiff Marlowe  
27 Patent Holdings LLC  
28

22 Dated: June 8, 2010  
23 Westfield, NJ